

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

The Defendant has requested that he have meaningful access to the evidence in his case. Because he is in custody at the Charleston County Detention Center, he requests an order that would allow him to review his discovery at the jail by way of a computer. This request would constitute an exception to the Order Governing Discovery already in place. Assistant U.S. Attorney Elle Klein consents to this motion.

The Government has provided electronic copies of the discovery to the Defendant's attorney. The contents, except for Restricted Access 00022 through Restricted Access 00206 and Restricted Access 00417, would be placed onto the hard drive of a laptop, and the laptop labeled as property of the Federal Public Defender's Office. There is no other discovery on the laptop from any other case, and the laptop does not have internet access. The Defendant requests that this Court order the Charleston County Detention Center make the laptop available to the Defendant while he is in custody at the facility. The laptop would be password protected, with the Defendant having a unique user identification and password combination, provided only to him. Neither the jail nor any other person would have access to the laptop except employees of the Attorney.

The Defendant agrees that the information on the laptop would not be shown to any other individual, that he is not permitted to have the computer in his cell, and that he could only view the discovery in a room at the jail dedicated to this purpose. The Federal Public Defender's Office would be available to meet with staff at the jail for a review of the laptop and security measures. The Defendant would be permitted to take notes while he reviews the discovery, but no one else would be allowed access to the notes or the laptop, nor is the jail allowed to provide access to any other individual other than the Defendant.

Respectfully submitted,

s/Ann Briks Walsh
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